



# **Notice of Funding Availability for HUD's FY 2014-2015 Comprehensive Housing Counseling Grant Program**

## **Frequently Asked Questions**

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### **TRAINING:**

- 1) Question: How can I obtain training on the FY2014-2015 Comprehensive Housing Counseling NOFA?**

Answer: The Housing Counseling NOFA Training Webinar was webcast live on 3/11/2014). This webinar from the HUD Office of Housing Counseling has been archived and is now available for viewing. The webinar discusses the FY2014-2015 NOFA for HUD's Comprehensive Housing Counseling Grant Program and changes to the application process including new charts, funding methodologies, rating factors with information on specific charts, as well as submission requirements and other technical issues. The Webinar Duration is 2 hours, Webinar and Course materials can be found [on-line](#).

### **HOUSING COUNSELING NOFA ASSISTANCE:**

- 1) Question: I have several questions about the Comprehensive Housing Counseling Grant Program NOFA. Is there somebody I can speak to directly to discuss some of these questions?**

Answer: A team of HUD's Office of Housing Counseling staff is working to answer questions about the NOFA in order to provide consistent written response to all questions. Please e-mail your questions to: [housing.counseling@hud.gov](mailto:housing.counseling@hud.gov) and put

“FY 2014-2015 NOFA” in the subject line. You will receive a response either directly or via the list of Frequently Asked Questions posted on: [hud.gov/housingcounseling](http://hud.gov/housingcounseling)

## **ELIGIBILITY AND DECIDING HOW TO APPLY:**

### **1) Question: Must an organization be an approved housing counseling agency to apply for the Comprehensive Housing Counseling Grant Program NOFA?**

Answer: Only HUD-approved housing counseling agencies and State Housing Finance Agencies are eligible to apply directly to HUD for the Comprehensive Housing Counseling Program NOFA. Please see Section III. B. “Eligible Applicants,” Paragraph 1. If your organization is interested in becoming a HUD-approved housing counseling agency, you may begin the process by completing form HUD-9900, “Application for Approval as a Housing Counseling Agency.” If your agency is not currently eligible to apply for funding under the FY2014-2015 NOFA but is interested in securing funding to support housing counseling activities, your organization might explore the possibility of indirect funding from HUD as a sub-grantee of a HUD-approved Intermediary or a State Housing Finance Agency grant applicant. Please see Appendix A of the NOFA for a list of HUD-approved Intermediaries and State Housing Finance Agencies.

### **2) Question: Can you tell me which Intermediaries are located in the same county as my agency?**

Answer: Most Intermediaries have the discretion to include in their applications agencies located in any given county regardless of their physical location. You can find a list of HUD-approved Intermediaries and State Housing Finance Agencies in Appendix A of the NOFA.

### **3) Question: We have been a HUD-approved LHCA for many years. Given HUD’s increased support for networks, would our efforts be better spent applying for a grant directly or through an Intermediary or State Housing Finance Agency?**

Answer: HUD cannot advise your agency whether to apply directly for funds as an LHCA, or to network with a parent organization. HUD desires to provide an incentive to affiliate with an Intermediary or State Housing Finance Agency (SHFA) and to recognize the additional costs and benefits that arise from the parent relationship. See Section I.C.4 Encouraging Counseling Networks.

A HUD-approved LHCA has two options for grant application under the FY 2014-2015 Housing Counseling NOFA. The HUD-approved LHCA may apply directly to HUD. Alternatively, a HUD-approved LHCA may be included as a sub-grantee in

the application of an Intermediary or SHFA. The Intermediary or SHFA will receive a Base Award amount based on the number of proposed sub-grantees of that parent organization. This NOFA encourages LHCA's to network and become sub-grantees of parent organizations. However, the parent organization will have discretion on how it disburses and appropriates grant funds to its sub-grantees.

- 4) Question: Our agency has previously applied for funding as a Local Housing Counseling Agency (LHCA). If we choose to apply with an Intermediary under this NOFA, does that preclude us from applying as an LHCA in the future?**

Answer: HUD cannot comment on the requirements of future Housing Counseling Program NOFAs. However, the fact that a HUD-approved LHCA has previously partnered with an Intermediary to obtain housing counseling funding does not preclude the LHCA from applying directly to HUD for grant funds under this NOFA.

- 5) Question: We do not have a housing counseling network in this area. If we plan or collaborate to build one should we still apply for the FY 2014-2015 Comprehensive Housing Counseling Grant Program NOFA?**

Answer: The type of collaboration or network you refer to in your question will be instrumental in determining if that network is eligible to apply for this FY 2014-2015 NOFA. All housing counseling agencies (including Local Housing Counseling Agencies (LHCA), Intermediaries and Multi-State Organizations (MSO) that are directly approved by HUD, and State Housing Finance Agencies (SHFA) are eligible to apply directly to HUD for this NOFA. However, each LHCA, Intermediary, and MSO that applies under this NOFA must have directly obtained HUD approval prior to the NOFA issue date to be eligible to receive grant funding under this NOFA. SHFAs are eligible to apply directly without having obtained prior HUD-approval. Housing Counseling agencies that have not received HUD approval are encouraged to affiliate with a HUD-approved Intermediary, MSO or SHFA. Approved Intermediaries, MSOs or SHFAs will receive a Base Award amount based on the number of proposed sub-grantees of that parent organization. See page 30 of the NOFA "Funding Methodology" for additional information.

- 6) Question: We are a HUD-approved LHCA that will again apply to HUD directly for grant funds. We don't think the Intermediaries in our region are a good match for our agency. Therefore, in the future, we would like to apply for funding as an Intermediary. What is the process for becoming an approved Intermediary?**

Answer: You can view information on the HUD approval process [on-line](#). Detailed information and additional requirements of the Housing Counseling Program are

provided in the [Housing Counseling Program Handbook 7610.1, Rev-5](#). Chapter 2 of the Handbook describes the HUD-approval process. The Handbook is available through HUDCLIPS on HUD's website, and may be requested by telephone weekdays between the hours of 8:00 a.m. and 5:15 p.m. ET by calling (800) 767-7468. Written requests should be addressed to:

U.S. Department of Housing and Urban Development  
Distribution Section, Room B-100  
451 Seventh Street, SW  
Washington, DC 20410

**7) Question: Where can I find specifics about applying for the Housing Counseling Program NOFA as a State Housing Finance Agency?**

Answer: For information on applying for the grant as a State Housing Finance Agency, see "Application and Submission Information" in Section IV.B.2.e. on page 15 of the NOFA. In order to apply for grant funds, State Housing Finance Agencies must submit evidence of their statutory authority to operate as a SHFA, and evidence of their authority to apply for funds and subsequently use any funds awarded. SFHA applicants should also verify the accuracy of their agency profile in HUD's Housing Counseling System (HCS), and validate the information in HCS prior to submitting their grant application. HUD will contact SHFA Applicants that are new to the program to establish their profiles in the HCS system.

**8) Question: As a SHFA, do we need to complete and submit the 9900 form to be eligible to apply for the FY2014-2015 NOFA, or can we just submit our application?**

Answer: To apply for the FY 2014-2015 NOFA, a State Housing Finance Agency ("SHFA") is not required to submit an application for approval (Form HUD-9900) to participate in HUD's Housing Counseling Program provided that the SFHA has the statutory authority to provide housing counseling throughout their entire state and adheres to all program requirements as outlined in 24 C.F.R. Part 214, HUD Handbook 7610.1, REV-5, and other governing documents. However, if the SFHA applies for but does not receive HUD Housing Counseling Program funds, the SFHA will be required to submit to HUD the information requested in the HUD Form 9900. There two paths through which a SHFA may begin participating in HUD's Housing Counseling Program:

A. Submit a successful grant application or otherwise be awarded a HUD housing counseling grant. For information on applying for the grant as a State Housing Finance Agency, see "Application and Submission Information" in Section IV.B.2.e. on page 15 of the NOFA. In order to apply for grant funds, State Housing

Finance Agencies must submit evidence of their statutory authority to operate as a SHFA, and evidence of their authority to apply for funds and subsequently use any funds awarded. SFHA applicants should also verify the accuracy of their agency profile in HUD's Housing Counseling System (HCS), and validate the information in HCS prior to submitting their grant application. HUD will contact SHFA. Applicants that are new to the program to establish their profiles in the HCS system.

B. Submit a request and, if applicable, provide HUD with a list of affiliates and assure that each affiliate meets all program requirements. SHFAs not planning to submit a housing counseling grant application or that failed to receive funding from HUD but are still interested in participating in HUD's Housing Counseling Program must submit the information required for SHFAs in form HUD-9900 Housing Counseling Program Application, to the HUD Homeownership Center that has jurisdiction over their state. See Appendix 1 of Handbook 7610.1, Rev-5.

**9) Question: Do the OMB A-133 audit filing requirements, as outlined on page 11 of the NOFA "External Audits and Investigations," apply to the sub-grantee network as well?**

Answer: Yes. The requirements of OMB A-133 apply to non-Federal entities that receive Federal cost-reimbursement contracts either directly from Federal awarding agencies or indirectly from pass-through entities. Under this NOFA, a sub-grantee of a network will be receiving Federal funds indirectly through a pass-through entity, and therefore, OMB A-133 requirements apply.

**10) Question: Should the agency's independent audit be submitted to its Office of Housing Counseling Point of Contact (POC) prior to the grant submission, or should the current independent audit be submitted as an attachment in the grant submission?**

Answer: The most recent audit of financial activities must be submitted as an attachment in the application submission. More detailed instructions regarding "External Audits and Investigations" are included on pages 11 and 16 of the NOFA."

**11) Question: Is there a standard, HUD-recommended sub-grant agreement form for this section? Or can the sub-grantee agreement be crafted by our general counsel?**

Answer: HUD does not provide a suggested or sample sub-award agreement for a parent agency to execute with its sub-grantees. However, all sub-award agreements must satisfy the requirements of the General Section of the NOFA and the grant agreement between HUD and the grantee.

**12) Question: Is it necessary for us, as the direct grantee, to have a Client Management System, since we do not provide direct counseling services to**

**clients? As a follow-up, is it necessary for all sub-grantees to use the same Client Management System as we do in order to report to us?**

Answer: Yes, program regulations require every agency participating in the Housing Counseling Program to utilize a Client Management System (CMS), including intermediaries or SHFAs that do not provide services directly. Intermediaries and SHFAs would still utilize a CMS to submit to HUD agency profile information, and, ideally, evaluate the performance of agencies in their network. It is not required that all sub-grantees of funded branches in one network utilize the same CMS, although HUD recommends they do.

**13) Question: If an agency has been funded under an Intermediary, is it considered HUD-approved?**

Answer: Simply being funded as a sub-grantee by a HUD-approved Intermediary in the past does not make an agency a HUD-approved Housing Counseling Agency, nor does an agency's status as a sub-grantee make them eligible to apply directly to HUD for a grant as either a Local Housing Counseling Agency or an Intermediary under this NOFA. Only HUD-approved housing counseling agencies, meaning agencies that are directly approved by HUD and State Housing Finance Agencies are eligible to apply directly for the FY 2014-2015 Comprehensive Housing Counseling Grant Program NOFA. Please see Section III. B. "Eligible Applicants," Paragraph 1. If your organization is interested in becoming a HUD-approved housing counseling agency to possibly apply independently under future NOFAs, you may begin the process by completing form HUD-9900, "Application for Approval as a Housing Counseling Agency." This form and instruction can be accessed via HUD's [website](#).

**14) Question: Can a LHCA affiliate with more than one Intermediary? For example, if you are a member of NeighborWorks and participate with that organization in the NOFA, can you also participate with another Intermediary or SHFA?**

Answer: As stated on page 8 of the Comprehensive Housing Counseling Grant Program NOFA, applicants and sub-grantees are prohibited from accessing HUD Housing Counseling Program grant funding under this NOFA from multiple sources. The intent of this requirement is to prohibit an agency from applying for and/or receiving funds under this NOFA from multiple sources, such as more than one intermediary. However, there are two specific exceptions to this "double dipping" prohibition. See pages 8-9 of the NOFA for detailed information about these exceptions.

## **COMPLETING THE APPLICATION:**

- 1) Question: I have attempted to download the Comprehensive Housing Counseling Grant application on [www.grants.gov](http://www.grants.gov). I can get only as far as entering my email address so that I will receive updates. I have backed out and attempted to download several times, but cannot. Can you please provide assistance with this?**

Answer: If you have technical difficulties in accessing the grant application materials through Grants.gov, you should call the Grants.gov help desk at (800) 518-4726, or you can e-mail [support@grants.gov](mailto:support@grants.gov). The Grants.gov help desk is available 24 hours a day, 7 days per week, except federal holidays. If you are experiencing technical difficulties with electronic application submission, it is imperative that you maintain careful records of all your communications with [www.grants.gov](http://www.grants.gov) attempting to resolve the issue.

- 2) Question: The NOFA refers to a set of charts which are not included in the zip folder on Grants.gov. How can these best be accessed?**

Answer: The grant application download in [www.grants.gov](http://www.grants.gov) includes two sets of zip folders: one labeled "Download Application Instructions" and another labeled "Download Application Package." The charts are included in the zip folder labeled "Download Application Instructions" in an Excel document titled "HUD 9906 Housing Counseling Charts.xlsx."

- 3) Question: How do we verify the status of our organization in order to receive the bonus points for "Preferred Sustainable Communities Status"? We have downloaded Form HUD 2995, but are unsure about contacting a point of contact.**

Answer: To verify whether your program will be operating within a [Preferred Sustainable Status Community Area](#). This website lists eligible areas and identifies points of contact for each area. The points of contact are authorized to certify on Form HUD-2995 that your program meets the Preferred Sustainable Communities Status requirements.

- 4) Question: In prior years, Intermediaries needed to provide the names of all counselors that would be providing counseling services under the grant. I do not see this requirement in the FY 2014-2015 application. I know that each sub-grantee needs to respond to some questions in the HUD-9906 about their staff's training and certification, but it's not clear if counselor-level detail is required.**

Answer: In an effort to streamline the Housing Counseling Program NOFA, HUD has reduced the level of detail required for counselors who will provide counseling services under the grant. The names of each counselor do not need to be provided.

See Charts A1 and A2 along with the narrative descriptions in the NOFA for the relevant information, including training and certification, which you need to complete for each sub-grantee.

- 5) Question: As an Intermediary, should we provide a succession plan (page 29 of the NOFA), for our organization or for our sub-grantees? Also, our sub-grantees are in rural areas, with no other counseling agencies nearby. How do they possibly have a succession plan?**

Answer: As provided in the NOFA, Intermediary-applicants must provide a transition or succession plan that includes you as the parent organization, as well as each of your proposed sub-grantees. Although you do not counsel clients as the parent organization, your succession plan should still provide a plan to ensure continuity of services to consumers in the event that you or a sub-grantee become ineligible for continued funding notwithstanding your (or your sub-grantee's) proximity to other housing counseling agencies. One of the primary purposes of a succession plan is to ensure that if something adverse happens to an Intermediary, there is a plan in place to guarantee continued counseling from sub-grantees and/or a plan for sub-grantees to re-affiliate with other Intermediaries.

- 6) Question: We have reviewed the NOFA and understand the base amount but did not see information and calculation of the administrative portion of the funding. Is there a set percentage or base amount of administrative fee associated with this grant?**

Answer: The NOFA does not set a specific percentage or amount of administrative fees for the purpose of calculating award amounts. After learning the number and nature of actual applicants, HUD will likely select and uniformly apply a percentage of the Base Award. This is a cost reimbursement grant, so administrative fees must be the actual cost to administer your agency's housing counseling program.

- 7) Question: In Chart A, as an Intermediary that also has a branch, would I fill out a line for both the Intermediary and the branch?**

Answer: Yes, just as occurs in the example provided for Chart A2.

- 8) Question: How should we provide the Organization Description as stated on page 15 of the NOFA?**

Answer: The Organization Description should be attached to the Applicant's grant application as a separate document. We prefer that the description be in Word format.



**9) Question: We are an SHFA that will be applying for this funding for the first time. What should we demonstrate to satisfy the past performance impact category? (Rating Factor 3, Sub factor 1- HUD will utilize 9902 Form).**

Answer: Agencies that did not electronically submit to HUD a form HUD9902 for the period October 1, 2012 through September 30, 2013 (e.g. an SHFA that did not participate in HUD's Housing Counseling Program in FY13) must submit a HUD-9902 for the period October 1, 2012 – September 30, 2013 as part of their NOFA application (see "Application Checklist" on NOFA pages 15 – 16). This HUD-9902 report should reflect the total housing counseling activity of the Applicant and its network (if applicable) for FY 2013. See HUD Handbook 7610 for additional guidance on completing the HUD-9902 report

**10) Question: We are an SHFA that will be applying for this funding for the first time. How can we complete Chart E for the period 10/1/12 – 9/30/13? (Rating Factor 3 (1B))**

Answer: Chart E should include the Applicant's total housing counseling program budget for the period October 1, 2012 – September 30, 2013, including all sources of funding (not just HUD funding). This budget should reflect the budget used to operate your housing counseling program during FY2013, regardless of whether or not HUD funding was received during that year.